



Richman & Richman LLC

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May 28, 2025

Via CM/ECF

Honorable G. Michael Halfenger
Chief United States Bankruptcy Judge
United States Bankruptcy Court
Eastern District of Wisconsin
517 East Wisconsin Avenue, Room 140
Milwaukee, WI 53202

RE: *In re: Wisconsin & Milwaukee Hotel LLC* (the “**Debtor**”)
Case No. 24-21743

Dear Judge Halfenger:

Further to the letter I filed earlier this afternoon, I am writing on behalf of the Debtor to report an agreement among the Debtor and all parties who filed objections to Plan confirmation (Computershare Trust Company, N.A., Wisconsin & Milwaukee Hotel Funding LLC, White Lodging Services Corporation, and Marriott International, Inc.) in response to the Court’s notice of Friday, May 23, 2025 at Doc 552, and in modification and supplementation of the Court’s prior Scheduling Order at Doc 495. The parties are agreed that if the Court approves the consensual schedule and protocols set forth below, the status conference previously scheduled for June 2, 2025 at 1:30 p.m. (per Doc 495) may be cancelled.

Friday, June 6: Deadline for matters previously set for May 28 by Order at Doc 495, including that Debtor and Objecting parties who intend to offer expert testimony shall serve (but not file) expert reports, Debtor and Objecting parties who intend to offer other witness testimony to serve and file witness list (including expert witnesses) (“**Witness List**”) with summary of testimony by each witness, and in the Witness List, for each witness expected to present evidence under FRE 702, 703, or 705, parties should identify the subject matter, and provide a summary of the facts and opinions to which the witness is expected to testify. In addition, the Debtor and Lenders have agreed that in the case of appraisers the Debtor and the Lenders shall serve the appraisals they intend to rely upon in the confirmation hearings as the expert reports of such appraisers. *Per Doc 495, the failure to identify a witness will result in exclusion of the witness, except upon a showing that the failure was substantially justified or harmless.*

Friday, June 13: Deadline for Parties to confer (among themselves and with identified witnesses) and seek to establish consensual schedule for witness depositions to take place between Monday, June 23 and Friday, July 11 (“**Deposition Schedule**”). The parties will endeavor to conduct by Zoom all depositions of witnesses who are located outside Wisconsin, but such depositions shall be conducted in person if requested by the party seeking the deposition. Depositions of witnesses located within Wisconsin shall be conducted in person, unless the parties agree otherwise.



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Friday, June 20: Deadline for Parties who served expert reports to serve expert rebuttal reports if they wish to do so. A party who did not serve an expert report may not serve or otherwise utilize any rebuttal reports.

Thursday, July 3: Deadline for Debtor to file and serve any Plan supplement (exclusive of any new or revised management agreement and franchise agreement).

Friday, July 11: Deadline for Debtor to file and serve any new or revised management agreement and franchise agreement, with appropriate motions to authorize or assume (and in the case of any management or franchise agreement intended to be replaced, reject); and for all Objecting parties to file lists of exhibits intended to be used, and to file and serve such exhibits on each other. The Objecting parties may elicit testimony (including expert testimony) about new information disclosed in any Plan supplement, as well as any new or revised management agreement and franchise agreement, whether or not the topic of such testimony was previously disclosed or discussed in an expert or rebuttal report.

Tuesday, July 15: Deadline for completion of discovery.

Wednesday, July 16: Deadline for Debtor to file Brief in Support of Plan Confirmation, including Replies to all Objections; ordinary page limit restrictions for briefs will not apply.

Thursday, July 17: 1:30 p.m. (telephonic): final pretrial conference (*previously scheduled per Doc 495*).

Friday, July 18: Extended deadline for any discovery relating to new or revised management agreement and franchise agreement.

Monday, July 21 – Friday, July 25: Plan confirmation hearings in person each day commencing at 10 a.m. at the Bankruptcy Court (Halfenger, J.), Eastern District of Wisconsin (*previously scheduled per Doc 495*).

Respectfully submitted,

RICHMAN & RICHMAN LLC

Michael P. Richman
MPR/ hms